

LAW OFFICES OF  
**WALKUP, MELODIA, KELLY, WECHT & SCHOENBERGER**  
A PROFESSIONAL CORPORATION

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**DOUGLAS S. SAELTZER (State Bar #173088)**  
**ATTORNEYS FOR PLAINTIFFS**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

CARLA CORTES, a minor, by and through her  
Guardian ad Litem, ISABEL CORTES  
GARCIA; ISABEL CORTES GARCIA; and  
JUAN CARLOS GARCIA TORRES

Plaintiffs,

v.

DAIMLER CHRYSLER CORPORATION, and  
DOES ONE through ONE HUNDRED,

Defendants.

Case No. 05-01012 JL

**STIPULATION AND ~~[PROPOSED]~~**  
**ORDER RE CONTINUATION OF NON-**  
**EXPERT DISCOVERY DEADLINE**

The parties, by and through their attorneys of record, hereby submit the following  
Stipulation to continue the deadline for non-expert discovery in the above-captioned matter from  
August 11, 2006 to September 30, 2006.

**REASON FOR REQUEST**

Nonexpert discovery has taken longer than expected, and both parties have further  
discovery to complete. Defendant wishes to schedule a medical exam of plaintiff Isabel Cortes  
and has been coordinating with the schedule of plaintiff and the physician. Plaintiffs are still  
waiting for responses to written discovery and are in the process of coordinating depositions of  
Chrysler employees in Michigan. Both parties desire to complete the deposition of the emergency  
response professionals who responded to the scene of this incident.

The parties stipulate and request that the Court continue the deadline for completion of non-expert discovery from August 11, 2006 to September 30, 2006.

**PREVIOUS TIME MODIFICATIONS**

The parties stipulated to, and the Court ordered, a continuation of the mediation deadline from December 16, 2005 to January 6, 2006. The parties stipulated to, and the court ordered, a continuation of the mediation deadline from January 6, 2006 to March 30, 2006.

**EFFECT OF PROPOSED TIME MODIFICATION ON CASE SCHEDULE**

The parties do not foresee negative effects on the case schedule resulting from this proposed deadline modification. The parties agree that, with a trial date of February 12, 2007, the three intervening months between the proposed non-expert discovery deadline and trial will be sufficient time to prepare the case for trial.

**STIPULATION**

The parties stipulate and request that the Court continue the deadline for non-expert discovery in the above-referenced matter from August 11, 2006 to September 30, 2006.

**IT IS SO STIPULATED.**

Respectfully submitted,

DATED: July 18, 2006

SEDGWICK, DETERT, MORAN & ARNOLD

By: Dennis E. Raglin  
DENNIS E. RAGLIN  
SEDGWICK, DETERT, MORAN & ARNOLD  
Attorneys for Defendant  
DAIMLER CHRYSLER CORPORATION

DATED: July 18, 2006

WALKUP, MELODIA, KELLY, WECHT &  
SCHOENBERGER

By: Douglas S. Saeltzer  
DOUGLAS S. SAELTZER  
WALKUP, MELODIA, KELLY, WECHT &  
SCHOENBERGER  
Attorneys for Plaintiffs CARLA CORTES, a  
minor, by and through her Guardian at Litem,  
ISABEL CORTES GARCIA; ISABEL CORTES

GARCIA; and JUAN CARLOS GARCIA  
TORRES

I, Douglas S. Saeltzer, am the ECF User whose ID and password are being used to file this  
Stipulation and [Proposed] Order Re Continuation of Non-Expert Discovery Deadline. In  
compliance with General Order 45, X(B), I hereby attest that Dennis Raglin has concurred in this  
filing.

By: Douglas S. Saeltzer  
DOUGLAS S. SAELTZER

[PROPOSED ORDER ON FOLLOWING PAGE]

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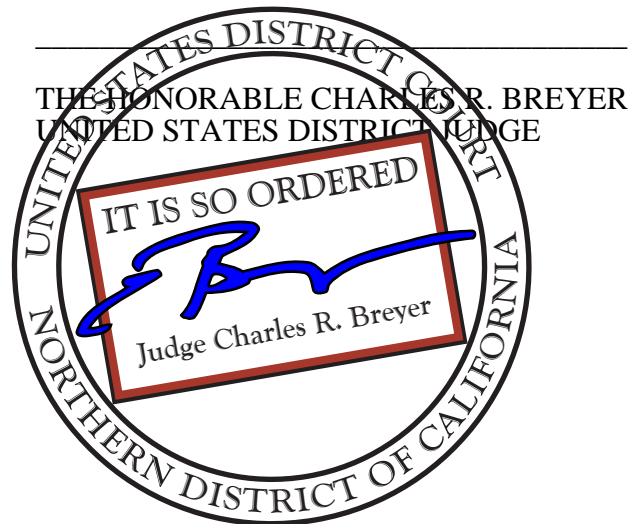
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**~~PROPOSED~~ ORDER**

Pursuant to the Stipulation above, the deadline for non-expert discovery in the above-captioned matter is hereby continued to September 30, 2006.

**IT IS SO ORDERED.**

DATED: July 20, 2006



THE HONORABLE CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE